

EXHIBIT 70

Subect to Protective Order

Page 1	Page 3
<p>UNITED STATES DISTRICT COURT DISTRICT OF NEVADA</p> <p>-----</p> <p>ORACLE USA, INC., a) Colorado Corporation;) CASE NO: ORACLE AMERICA, INC., a) 2:10-CV-0106-LRH-PAL Delaware Corporation; and) ORACLE INTERNATIONAL) CORPORATION, a California) Corporation,) Plaintiffs,)) Vs.)) RIMINI STREET, INC., a) Nevada Corporation; Seth) Ravin, an individual,)) Defendants.)</p> <p>-----</p> <p>SUBJECT TO PROTECTIVE ORDER</p> <p>-----</p> <p>ORAL AND VIDEOTAPED DEPOSITION OF CLARK STRONG October 20th, 2011</p>	<p>1 A P P E A R A N C E S 2 FOR PLAINTIFFS: 3 Mr. Geoffrey M. Howard Bingham McCutchen 4 Three Embarcadero Center San Francisco, California 94111-4067 5 P 415.393.2000 F 415.393.2286 geoff.howard@bingham.com 6 7 FOR DEFENDANTS: 8 Mr. Ryan J. Schletzbaum 9 Ms. Megan J. Redmond Shook, Hardy & Bacon, LLP 10 2555 Grand Boulevard Kansas City, Missouri 64108-2613 11 P 816.474.6550 F 816.421.5547 rschletzbaum@shb.com mredmond@shb.com 12 13 FOR THE WITNESS: 14 Ms. Sandi Pearson Tarski Walsh, Anderson, Brown, Gallegos and Green, PC 15 909 Hidden Ridge Drive Suite 410 16 P.O. Box 168046 Irving, Texas 75016-8046 17 P 214.574.8800 F 214.574.8801 starski@irv.wabsa.com 18 19 20 ALSO PRESENT: Mr. Billy Gonzalez, Videographer 21 22 23 24 25</p>
Page 2	Page 4
<p>1 ORAL AND VIDEOTAPED DEPOSITION OF CLARK 2 STRONG, produced as a witness at the instance of the 3 Plaintiffs, and duly sworn, was taken in the 4 above-styled and numbered cause on the 20th of 5 October, 2011, from 8:58 a.m. to 10:58 a.m., before 6 Daniel J. Skur, Notary Public and Certified 7 Shorthand Reporter in and for the State of Texas, 8 reported by stenographic means, at the Birdville 9 Administrative Offices, 3126 Carson Street, Haltom 10 City, Texas, pursuant to the Federal Rules of Civil 11 Procedure.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 P R O C E E D I N G S 08:46:11 2 (Deposition Exhibit 598 marked.) 08:46:11 3 (Deposition Exhibit 599 marked.) 08:47:47 4 VIDEOGRAPHER: Go on the record 08:58:03 5 Thursday, October 20th, 2011. Time is approximately 08:58:24 6 8:58 a.m. Will the court reporter please swear in 08:58:27 7 the witness. 08:58:32 8 CLARK STRONG, 9 having been duly sworn, testified as follows: 10 (8:58 a.m.) 11 EXAMINATION 12 BY MR. HOWARD: 13 Q. Mr. Strong, could you please state and 08:58:50 14 spell your name for the record? 08:58:52 15 A. My -- Clark Strong, C-L-A-R-K, 08:58:53 16 S-T-R-O-N-G. 08:58:58 17 Q. And by whom are you employed? 08:58:58 18 A. Birdville ISD. 08:59:00 19 Q. And ISD stands for? 08:59:01 20 A. Independent School District. 08:59:03 21 Q. Thank you, sir. My name is Geoff 08:59:04 22 Howard. I represent Oracle, and I'll be asking some 08:59:06 23 questions this morning, and you may get questions 08:59:08 24 from some of the other attorneys here. I think your 08:59:12 25 counsel wanted to say something. 08:59:14</p>

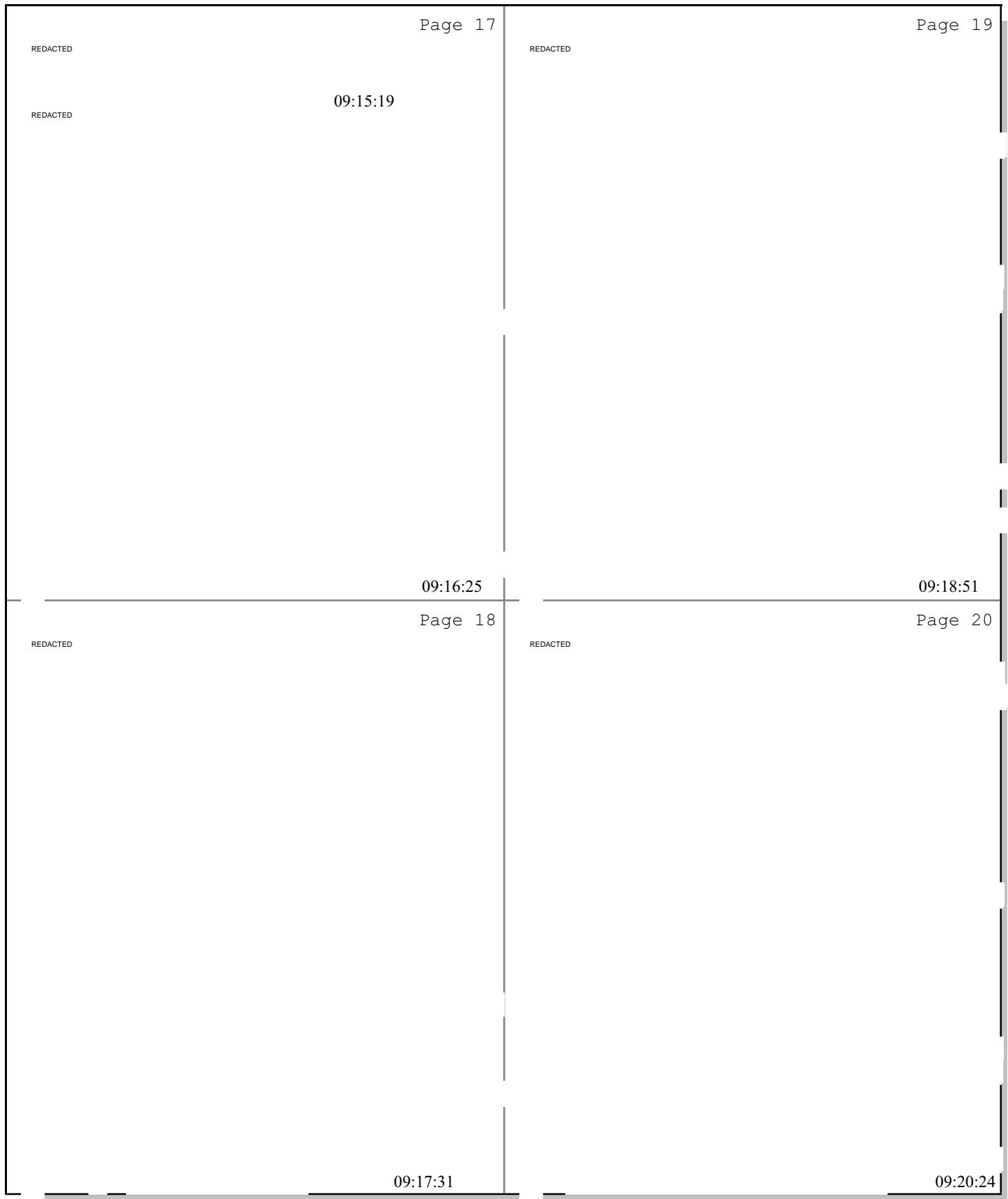
1 (Pages 1 to 4)

Subject to Protective Order

Page 13			Page 15		
1 A. Yes.	09:09:20		1 MR. SCHLETZBAUM: Same objection.	09:12:19	
2 THE WITNESS: That is a lawn mower.	09:09:26		2 A. I'm not sure. I think I would have	09:12:24	
3 MS. TARSKI: What did you say?	09:09:29		3 recommended to my supervisor that we -- that we go	09:12:26	
4 THE WITNESS: That's a lawn mower,	09:09:30		4 forward with it.	09:12:34	
5 that noise.	09:09:32		5 BY MR. HOWARD:	09:12:36	
6 MR. HOWARD: He read my mind.	09:09:34		6 Q. What would have been your solution to	09:12:36	
7 MS. TARSKI: It's not a large area	09:10:00		7 getting tax and regulatory updates in that event?	09:12:38	
8 they're mowing out there, right? I mean --	09:10:02		8 A. Would have done it ourselves. We did it	09:12:40	
9 THE WITNESS: Where they're mowing	09:10:04		9 in the past.	09:12:43	
10 right now is not a large area, but they will work	09:10:05		10 Q. When was that? When did you do your own	09:12:44	
11 their way along the building, that building --	09:10:08		11 tax and regulatory updates?	09:12:48	
12 (Simultaneous conversation.)	09:10:08		12 A. It would have been in the late '80s.	09:12:49	
13 MS. TARSKI: I'm just thinking in	09:10:08		13 Q. Was that on PeopleSoft software?	09:12:59	
14 terms of this room, they'll be moving on.	09:10:08		14 A. Oh, no.	09:13:01	
15 THE WITNESS: Excuse me.	09:10:14		15 Q. What software was that?	09:13:03	
16 MR. HOWARD: He'll tell us if the	09:10:14		16 A. I don't recall the name of it.	09:13:06	
17 video -- if the audio quality is being impacted. I	09:10:16		17 Q. Did you evaluate the feasibility of	09:13:08	
18 think we're okay.	09:10:17		18 doing self support on PeopleSoft software at the	09:13:11	
19 Let's mark as Exhibit 600 the	09:10:19		REDACTED		
20 support services agreement for PeopleSoft between	09:10:22				
21 Birdville and Rimini Street.	09:10:25				
22 (Deposition Exhibit 600 marked.)	09:10:26				
23 BY MR. HOWARD:	09:11:00				
24 Q. Mr. Strong, do you recognize this	09:11:01				
25 document?	09:11:03				
				09:13:34	
Page 14			Page 16		
REDACTED			1 Q. What other options were those?	09:13:34	
			2 A. We looked at other companies.	09:13:37	
			3 Q. Do you remember which ones?	09:13:40	
			4 A. eVerge and TomorrowNow are the two I	09:13:41	
			5 remember.	09:13:49	
			6 Q. Okay. And what was the nature of your	09:13:49	
			7 discussion with TomorrowNow?	09:13:54	
			8 A. I don't remember, you know. The only	09:14:03	
			9 thing I can remember about discussing with	09:14:14	
			10 TomorrowNow was that they were similar to Rimini	09:14:16	
			11 Street, but there was one difference.	09:14:20	
			12 Q. What was that difference?	09:14:23	
			13 A. The Rimini -- TomorrowNow didn't support	09:14:25	
			14 customizations to the PeopleSoft software.	09:14:31	
			15 Q. Was that the deciding factor as between	09:14:33	
			16 TomorrowNow and Rimini Street?	09:14:36	
			17 A. Yes.	09:14:37	
			18 Q. Was the price basically the same?	09:14:37	
			19 A. I don't recall the price.	09:14:41	
			20 Q. Was the manner of support as they	09:14:43	
			21 described it to you essentially the same, to your	09:14:46	
			22 understanding?	09:14:48	
			23 A. I don't recall.	09:14:50	
			REDACTED		
			RE	09:15:10	

4 (Pages 13 to 16)

Subect to Protective Order



5 (Pages 17 to 20)

Subject to Protective Order

		Page 21	Page 23
REDACTED			
1	whom you are primarily speaking in the course of	09:23:04	
2	making the decision to recommend Rimini Street to	09:23:06	
3	the school district?	09:23:08	
4	A. Yes.	09:23:09	
5	Q. Okay.	09:23:10	
6	MS. TARSKI: If during your	09:23:12	
7	deposition there's something that you've said that	09:23:14	
8	you do want to clarify, you can let him know and	09:23:16	
9	clarify.	09:23:19	
10	THE WITNESS: Okay.	09:23:20	
11	MR. HOWARD: I want your best	09:23:20	
12	testimony, so -- and if -- you go through documents	09:23:22	
13	and things come back to you, it's a very normal	09:23:23	
14	thing.	09:23:26	
15	THE WITNESS: Okay.	09:23:26	
REDACTED			
19	09:21:16		
20	MR. HOWARD: Let's mark as Exhibit	09:21:46	
21	601 an email between M. Davichick at Rimini Street	09:21:47	
22	and Clark Strong on December 14th, 2006.	09:21:54	
23	(Deposition Exhibit 601 marked.)	09:21:58	
24	THE WITNESS: Can I ask you a	09:22:17	
25	question? No?	09:22:18	
	MS. TARSKI: You need to talk to me?	09:22:20	09:23:57
		Page 22	Page 24
1	THE WITNESS: Yes.	09:22:21	
2	MS. TARSKI: Can we --	09:22:22	
3	MR. HOWARD: If you need to go off	09:22:24	
4	the record, that's okay with me.	09:22:25	
5	MS. TARSKI: Do you need to take a	09:22:26	
6	quick break?	09:22:27	
7	THE WITNESS: I just want to ask a	09:22:28	
8	question.	09:22:30	
9	MS. TARSKI: Is it a question about	09:22:32	
10	the document?	09:22:32	
11	THE WITNESS: It's a question about	09:22:34	
12	something that the document reminded me of that I	09:22:35	
13	said earlier.	09:22:38	
14	MR. HOWARD: Oh, okay.	09:22:41	09:24:35
15	BY MR. HOWARD:	09:22:42	
16	Q. Well, you know, maybe I can just do it	09:22:43	
17	by asking you. Is there something about your prior	09:22:43	
18	testimony that you would like to clarify based on	09:22:47	
19	seeing this document, Exhibit 601?	09:22:52	
20	A. Yes.	09:22:54	
21	Q. Okay. Please do so.	09:22:55	
22	A. The gentleman I said his name was David?	09:22:56	
23	Q. Yes.	09:22:56	
24	A. His name was Michael Davichick.	09:22:59	
25	Q. So Michael Davichick was the person with	09:23:01	
REDACTED			
15	Q. Okay. Now, did you understand that --	09:24:35	
16	let me back up.	09:24:54	
17	What's -- in a very general sense,	09:24:55	
18	what's the nature of your job responsibilities with	09:24:58	
19	the school district, or what was it back in this	09:25:00	
20	time frame in the end of 2006?	09:25:03	
21	A. Technical support for PeopleSoft.	09:25:05	
22	Q. And are you generally familiar with the	09:25:10	
23	PeopleSoft software as part of that job?	09:25:12	
24	A. I'm one of the most familiar at the	09:25:17	
25	school district, yes.	09:25:20	

6 (Pages 21 to 24)

1 1
2 2
3 I, Daniel J. Skur, Certified Shorthand
4 Reporter and Notary Public in and for the State of
5 Texas, do hereby certify that the facts as stated by
6 me in the caption hereto are true; that there came
7 before me the aforementioned named person, who was
8 by me duly sworn to testify the truth concerning the
9 matters in controversy in this cause; and that the
10 examination was reduced to writing by computer
11 transcription under my supervision; that the
12 deposition is a true record of the testimony given
13 by the witness.

14 I further certify that I am neither
15 attorney or counsel for, nor related to or employed
16 by, any of the parties to the action in which this
17 deposition is taken, and further that I am not a
18 relative or employee of any attorney or counsel
19 employed by the parties hereto, or financially
20 interested in the action.

21 Given under my hand and seal of
22 office on this, the _____ day of October, A.D.,
23 2011.

24 15
25 16
26 17



27 Notary Public, State of Texas
28 My Commission Expires 7/10/2014

29 21
30 22
31 23
32 24
33 25